

Federal Defenders **MEMO ENDORSED**  
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Via E-mail and ECF

June 24, 2022

The Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Re: U.S. v. Eric Warren  
20 Cr 596 (KMK)

Dear Honorable Karas:

I am writing, jointly with the Government, to respectfully request that Your Honor adjourn Mr. Warren's upcoming (June 30, 2022) status conference for roughly 30-days. As background, the Government has made a plea offer and the parties are close to resolving the case but there is one Guidelines issue – specifically whether a particular sentencing enhancement applies – that we are looking into and which must be resolved before Mr. Warren can make an informed decision about the plea. I have spoken Mr. Warren, and, for these same reasons, he is also requesting this adjournment.

Relatedly, if the parties do come to a resolution (which is expected), I ask permission to have Mr. Warren plead guilty in front of a Magistrate Judge.

Finally, I ask that Your Honor exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), so that Mr. Warren may make an informed decision about the proposed plea and so that the parties can continue attempts to resolve the case.

Thank you for your consideration.  
Granted. The 6/30/22 conference is adjourned to  
7/28/22, at 11:30. Time is excluded until then, in the  
interests of justice, to allow the Parties to complete their  
discussions toward a resolution of this case. The  
interests of justice from this exclusion outweigh Mr.  
Warren's and the public's interests in a speedy trial.  
See 18 U.S.C. Section 3161(h)(7)(A).

Respectfully,

//s

Benjamin Gold  
Assistant Federal Defender

So Ordered.

6/27/22

cc: Derek Wikstrom (via e-mail and ECF)